UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In the Matter of the

* Docket No. 07 CV 6222(SHS)

* Arbitration Between

ARGONAUT INSURANCE COMPANY,

Petitioner,

- against - * FILED UNDER SEAL

GLOBAL REINSURANCE CORPORATION - U.S. Branch,

Respondent/
Counter-Petitioner,

- against -

ARGONAUT INSURANCE COMPANY, *

Respondent on Counter-Petition.

*

NOTICE OF MOTION TO REMAND

PLEASE TAKE NOTICE that, upon the annexed Affidavit of Dan E.

LaBelle and Petitioner's supporting Memorandum of law, Petitioner Argonaut
Insurance Company ("Argonaut") will move this Court, before the Honorable
Sidney H. Stein, at the United States Courthouse, Southern District of New York,
500 Pearl Street, New York, New York, as soon as counsel may be heard,
pursuant to 28 U.S.C. § 1447, for an order remanding the above-captioned case
back to the Supreme Court of New York, New York County, from which it was
removed.

CERTIFICATION OF SERVICE

This is to certify that the foregoing Motion to Remand was sent, via FedEx, on this 3rd day of August, 2007, to the following counsel of record:

Joseph J. Schiavone, Esq. Jeffrey S. Leonard, Esq. Budd Larner, P.C. 150 John F. Kennedy Parkway Short Hills, New Jersey 07078

Dan E. LaBelle

1020590-1(HSFP)

Westport, CT Dated:

August 3, 2007

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